

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LEGAL AID CHICAGO,)	
)	Case No. 1:23-cv-4809
Plaintiff,)	
)	Honorable Steven C. Seeger
v.)	
)	
HUNTER PROPERTIES, INC.,)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED SECOND MOTION TO
EXTEND TIME TO RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

Defendant Hunter Properties, Inc. (“Hunter Properties”) respectfully moves this Court to extend the time to answer or otherwise respond to Plaintiff Legal Aid Chicago’s (“Plaintiff”) First Amended Complaint [Dkt. 53] (“FAC”) by 30 days, up to and including January 21, 2025. Counsel for Hunter Properties has conferred with Plaintiff’s counsel, and Plaintiff does not oppose the requested extension. In support of its unopposed motion, Hunter Properties states:

1. Plaintiff filed the FAC on November 5, 2024, and therefore, the deadline for Hunter Properties to answer or otherwise respond to the FAC was initially November 19, 2024. Fed. R. Civ. P. 15(a)(3). On November 7, 2024, this Court granted Hunter Properties first Unopposed Motion to Extend Time to Respond to Plaintiff’s First Amended Complaint, extending the deadline for Hunter Properties to answer or otherwise respond to the FAC to December 19, 2024. [Dkt. 55.]

2. Counsel for Hunter Properties has been diligently working on a draft of Hunter Properties’ anticipated motion to dismiss the FAC, but the undersigned counsel experienced an unexpected family emergency a week before the deadline and is unable to finish the draft by the current deadline. As a result, Hunter Properties respectfully requests a 30-day extension of its deadline.

3. January 18, 2024, which is 30 days from the current deadline, falls on a Saturday, and the following Monday is a legal holiday. Thus, the requested 30-day extension will run until January 21, 2025.

4. Counsel for Hunter Properties conferred with Plaintiff's counsel, and Plaintiff does not oppose the requested extension and has agreed to a 30-day extension.

5. This is Hunter Properties' second request for an extension of time to respond to the FAC. Hunter Properties previously requested and was granted a 30-day extension of time to respond to the FAC to permit it time to prepare and file an appropriate responsive pleading given the complexity and nature of Plaintiff's claims. Hunter Properties previously requested and was granted two extensions of time to respond to Plaintiff's original Complaint.

6. Hunter Properties expressly reserves the right to raise all defenses it has to the FAC.

WHEREFORE, Defendant Hunter Properties, Inc. respectfully requests that this Court extend the deadline to answer or otherwise respond to Plaintiff's First Amended Complaint by 30 days, up to and including January 21, 2025.

Dated: December 17, 2024

Respectfully submitted,

/s/ Maria A. Boelen

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CERTIFICATE OF SERVICE

I hereby certify that on this date, December 17, 2024, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Maria A. Boelen